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**UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF CALIFORNIA  
OAKLAND DIVISION**

IN RE: SOCIAL MEDIA ADOLESCENT  
ADDICTION/PERSONAL INJURY PRODUCTS  
LIABILITY LITIGATION

THIS FILING RELATES TO:

*People of the State of California, et al. v. Meta Platforms, Inc., et al., No. 4:23-cv-05448-YGR*

MDL No. 3047

Case No. 4:22-md-03047-YGR

Honorable Yvonne Gonzalez Rogers

**STIPULATED REQUEST TO ENLARGE  
TIME TO FILE PAPERS RELATED TO  
PLAINTIFFS' ADMIN. MOTION TO  
DETERMINE WHETHER DEFENDANT  
META PLATFORMS, INC.'S  
MATERIALS SHOULD BE SEALED**

Pursuant to Civil Local Rules 6-1(b) and 6-2, the Parties, through their undersigned counsel, hereby stipulate and respectfully request that the Court enlarge the time for the Parties to file an omnibus sealing stipulation and any omnibus motions on sealing disputes related to Plaintiffs' Administrative Motion to Determine Whether Defendant Meta Platforms, Inc.'s Materials Should Be Sealed ("Sealing Motion") (Dkt. 6)<sup>1</sup> to November 22, 2023, and the time for filing any oppositions to omnibus motions on sealing disputes to December 13, 2023. The Parties declare in support of this request:

<sup>1</sup> References to the docket in Case No. 4:23-cv-05448-YGR are denoted “Dkt.” References to the MDL docket, Case No. 4:22-md-03047-YGR, are denoted “MDL Dkt.”

1       1. On October 24, 2023, Plaintiffs filed their Complaint (Dkt. 1) and Sealing Motion. On  
2 October 25, 2023, the case was added to this MDL;

3       2. The 217-page Complaint contains hundreds of paragraphs that are fully or partially  
4 provisionally filed under seal and redacted publicly because they contain information designated  
5 confidential by Meta Platforms, Inc. pursuant to a Confidentiality Agreement between the Parties that  
6 was entered during Plaintiffs' pre-suit investigation involving Defendants. Under that Confidentiality  
7 Agreement, Plaintiffs were obligated to file this information provisionally under seal and Defendants  
8 would have 30 days to move for a protective order to maintain the information's confidentiality;

9       3. Under the Court's Order Setting Sealing Procedures, the Parties have 14 days from the  
10 filing of the Complaint to file an omnibus sealing stipulation and any omnibus motions on remaining  
11 sealing disputes relating to the Complaint, the Parties have five business days to file any oppositions,  
12 and the Parties have five business days to file any replies, *see* MDL Dkt. 341 § II.A.;

13       4. Defendants require additional time to analyze whether and to what extent moving to  
14 seal the confidential information in the Complaint is warranted and/or confer with Plaintiffs to narrow  
15 or eliminate disputes over this issue;

16       5. The Parties do not seek to enlarge the five-business-day deadline to respond to any  
17 oppositions provided by the Court's Order Setting Sealing Procedures;

18       6. The Parties have not previously sought extensions of these deadlines; and

19       7. Extending these deadlines will not affect any other deadline fixed by the Court.

20       THEREFORE, pursuant to Local Rules 6-1(b) and 6-2, the Parties stipulate and respectfully  
21 request that the Court extend the Parties' deadline to file an omnibus sealing stipulation and any  
22 omnibus motions on sealing disputes related to the Complaint to November 22, 2023 and extend the  
23 Parties' deadline to file any oppositions to omnibus motions on sealing disputes to December 13,  
24 2023.

25       **IT IS SO STIPULATED AND AGREED.**

1 DATED: November 3, 2023

2  
3 Respectfully submitted,

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## ATTESTATION

I, Ashley M. Simonsen, hereby attest, pursuant to N.D. Cal. Civil L.R. 5-1, that the concurrence to the filing of this document has been obtained from each signatory hereto.

DATED: November 3, 2023

By: /s/ Ashley M. Simonsen  
Ashley M. Simonsen